

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

NESSA RISLEY, JAMES FREELAND,  
ROBERT SCOTT, ANNIE VENESKY,  
ANDREW CARDIS, and DEAN MEYERS,  
individually and on behalf of all others similarly  
situated,

Plaintiff,

v.

UNIVERSAL NAVIGATION INC. dba  
UNISWAP LABS, HAYDEN Z. ADAMS,  
PARADIGM OPERATIONS LP, AH  
CAPITAL MANAGEMENT, L.L.C. dba  
ANDREESSEN HOROWITZ, and UNION  
SQUARE VENTURES, LLC,

Defendants.

Case No. 1:22-cv-02780-KPF

**NOTICE OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Peter Trombly, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendant AH Capital Management, L.L.C. in the above-captioned matter.

I am a member in good standing of the Bar of the Supreme Court of Virginia, and a certificate of good standing from the Supreme Court of Virginia is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

Dated: November 21, 2022

Respectfully Submitted,

**LATHAM & WATKINS LLP**

/s/ Peter Trombly

Peter Trombly\*

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*\*Admitted to practice in Virginia only.*

*Attorney for Defendant AH Capital  
Management, L.L.C.*